

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

**DLJ Mortgage Capital, Inc.**

**CIVIL ACTION NO: 2:21-cv-00209-JDL**

**Plaintiff**

**vs.**

**RE:**

**16 Union Court, Boothbay Harbor, ME  
04538**

**Christopher M. Thonet, Dieuwertje W.  
Thonet and Concorde Acceptance  
Corporation**

**Mortgage:  
August 23, 2004  
Book 3358, Page 174**

**Defendants**

**Christopher Thonet, as trustee of The CT  
DT LLC Trust dated May 7, 2020 and  
Dieuwertje W. Thonet, as trustee of The CT  
DT LLC Trust, dated May 7, 2020;  
Damarsicotta Montessori School**

**Party-In-Interest**

**AFFIDAVIT OF RENEAU J. LONGORIA, ESQ. IN SUPPORT OF PLAINTIFF'S  
MOTION FOR DEFAULT JUDGMENT AS TO DEFENDANTS/PARTIES-IN-  
INTEREST**

I, Reneau J. Longoria, Esq., hereby depose and state as follows:

1. I am the Managing Member of Doonan, Graves & Longoria, LLC, the law firm who represents Plaintiff DLJ Mortgage Capital, Inc. ("DLJ Mortgage") in this matter. I submit this affidavit in support of Plaintiff's Motion for Default Judgment as to Defendants/Parties-In-Interest, Concorde Acceptance Corporation and Damarsicotta Montessori School, pursuant to Fed. R. Civ. P. 55(b).
2. Plaintiff's Complaint was filed on July 29, 2021.
3. The Defendant, Concorde Acceptance Corporation, was served with the Complaint on June 28, 2022.

4. The Party-In-Interest, Damarsicotta Montessori School, was served with the Complaint on September 17, 2021.
5. Proof of Service for Defendant, Concorde Acceptance Corporation, was filed on July 5, 2022.
6. Proof of Service for Party-In-Interest, Damarsicotta Montessori School, was filed on October 27, 2021.
7. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Defendant, Concorde Acceptance Corporation's response to the Complaint was due July 19, 2022.
8. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Party-In-Interest, Damarsicotta Montessori School's response to the Complaint was due October 8, 2021.
9. The Defendants are not in the military.
10. On August 16, 2022, Plaintiff filed a Motion for Entry of Default as to Defendant, Concorde Acceptance Corporation.
11. On November 12, 2021, Plaintiff filed a Motion for Entry of Default as to Party-In-Interest, Damarsicotta Montessori School.
12. On August 16, 2022, this Court entered Default as to Defendant, Concorde Acceptance Corporation.
13. On November 15, 2021, this Court entered Default as to Party-In-Interest, Damarsicotta Montessori School.
14. Upon information and belief, the attached payment history records received from our client were made at or near the time of the transactions by, or from information transmitted by someone with personal knowledge, pursuant to Fed. R. Evid. 803(6).
15. Upon information and belief, the attached payment history is kept in the course of a regularly conducted activity by our client, pursuant to Fed. R. Evid. 803(6).

16. Upon information and belief, the making of the attached records are a regular practice of our client's regularly conducted activity for maintaining records, pursuant to Fed. R. Evid. 803(6).

17. At the requested hearing, Plaintiff will produce a witness from the servicer of the subject loan to testify to the above.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 29th day of March, 2023.

/s/Reneau J. Longoria, Esq.  
Reneau J. Longoria, Esq.

**COMMONWEALTH OF MASSACHUSETTS**

ESSEX, ss.

Dated this 29th day of March, 2023

COUNTY OF ESSEX

On this 29th day of March, 2023, before me, the undersigned notary public, personally appeared Reneau J. Longoria, who proved to me through satisfactory evidence of identification to be the person whose name is signed on this document, who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his/her knowledge and belief.

/s/Paul Hayes  
Notary Public  
Commission Expires: 02/15/2030